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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

AMMON EDWARD BUNDY

Debtor.

Bankruptcy No. 24-23530

Chapter 7

Honorable William T. Thurman

**THE ST. LUKE CREDITORS' MOTION PURSUANT TO FED. R. BANKR. PRO.
2004 FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND
PRODUCTION OF DOCUMENTS BY, MOUNTAIN AMERICA CREDIT UNION
WITHOUT PRIOR NOTICE OR HEARING PURSUANT TO LOCAL RULE 2004-1**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP (together "St. Luke's Creditors"), submit their Motion for Rule 2004 Examination of non-debtor Mountain America Credit Union (the "Credit Union"), as follows:

1. The St. Luke's Creditors are judgment creditors of debtor Ammon Bundy ("Debtor"). Bundy committed intentional torts against them. They obtained a judgment in Idaho in excess of \$50 million against Debtor. Debtor's judgment liability remained in excess of \$50 million on the petition date.

2. Within seven months of filing his petition, Debtor caused substantial sums of money owned by him and his wife to be wired directly to accounts at the Credit Union owned by other persons.

3. The St. Luke's Creditors wish to conduct an examination of the Credit Union to discover how Debtor used his accounts there, and the accounts of other persons, to save, conceal and transfer funds that belonged to him.

4. Under Bankruptcy Rule 2004, this Court can empower the St. Luke's Creditors to take discovery from the Credit Union. Under Local Rule 2004-1, the Court can order such discovery without notice or hearing.

5. The St. Luke's Creditors move this Court to enter an Order authorizing the St. Luke's Creditors to conduct an examination of the Credit Union and compel production of documents from the Credit Union. The St. Luke's Creditors move the Court to permit the chapter 7 trustee and the Utah office of the United States Trustee for region 19 to participate in the discovery too.

6. The St. Luke's Creditors shall coordinate the date of the examination with the chapter 7 Trustee and the Utah office of the United States Trustee. The St. Luke's Creditors shall give the Credit Union no fewer than 14 days' prior written notice of the examination in accordance with Local Rule 2004-1(3)(A).

7. The St. Luke's Creditors shall compel the Credit Union's attendance by a subpoena in accordance with Bankruptcy Rule 2004(c), Bankruptcy Rule 9106, and Local Rule 2004-1(3)(A).

WHEREFORE, the St. Luke's Creditors seek relief under Bankruptcy Rule 2004 as set forth above without further notice or hearing. A proposed order has been lodged herewith.

DATED this 23rd day of September, 2024.

/s/ Robert A. Faucher
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Tracy Jungman, NP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of September, 2024, I caused the foregoing to be filed electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mark C. Rose
McKay, Burton & Thurman, P.C.
trustee@mbt-law.com

U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by U.S. First Class Mail and/or e-mail as indicated:

By U.S. First Class Mail – postage prepaid:

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/s/ Benjamin D. Passey

Benjamin D. Passey
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